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Attorneys for Plaintiffs
THOMAS WEISEL PARTNERS LLC and
THOMAS WEISEL INTERNATIONAL
PRIVATE LIMITED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THOMAS WEISEL PARTNERS LLC, a Delaware limited liability company, and THOMAS WEISEL INTERNATIONAL PRIVATE LIMITED, an Indian company,

Plaintiffs,

V.

BNP PARIBAS, a French corporation, BNP PARIBAS SECURITIES (ASIA) LIMITED, a Hong Kong company, and PRAVEEN CHAKRAVARTY, an individual

Defendants.

No. C-07-6198 MHP

Action Filed: December 6, 2007

DECLARATION OF MICHAEL L.
GALLO IN SUPPORT OF PLAINTIFFS'
CONSOLIDATED OPPOSITION TO
DEFENDANTS' MOTIONS TO
DISMISS THE FIRST AMENDED
COMPLAINT

Date: August 18, 2008
Time: 2:00p.m.
Place: Courtroom 15
Judge: Hon. Marilyn Hall Patel

REDACTED

1 I, Michael L. Gallo, declare:

2 1. I am an attorney admitted to practice before the Bar of the State of
3 California. I am an associate with the law firm of Howard Rice Nemerovski Canady Falk &
4 Rabkin, A Professional Corporation, counsel to Plaintiffs Thomas Weisel Partners LLC
5 ("TWP LLC") and Thomas Weisel International Private Limited ("TWIPL") in this action. I
6 make this Declaration upon personal knowledge and, if called upon to testify, could and
7 would testify competently hereto.

8 2. I make this declaration in support of Plaintiffs' Consolidated Opposition To
9 Defendants' Motions To Dismiss Plaintiff's First Amended Complaint.

10 3. Attached hereto as Exhibit A is a true and correct copy of excerpts from
11 Thomas Weisel Partners Group, Inc.'s Form S-1 Securities Registration Statement filed on
12 April 24, 2006. This document was collected at my direction from the Securities and
13 Exchange Commission's website and can be located electronically at the following url:
14 <http://www.sec.gov/Archives/edgar/data/1340354/000095013406007709/f19479sv1.htm>.

15 4. Attached hereto as Exhibit B is a true and correct copy of a BNP Paribas
16 September 19, 2006 press release titled "BNP Paribas announces new nominations in
17 Corporate Finance and Equity Brokerage in Asia." This document was collected at my
18 direction from the BNP Paribas website and can be located electronically at the following
19 url: <http://invest.bnpparibas.com/en/news/press-releases-prin.asp?Code=BDEV-6TSBP3>.

20 5. Attached hereto as Exhibit C is a true and correct copy of BNP Paribas
21 corporate information collected at my direction from the California Business Portal website
22 at my direction and can be located electronically at the following url:
23 <http://kepler.sos.ca.gov/corpdata>ShowAllList?QueryCorpNumber=C0559190&printer=yes>.

24 6. Attached hereto as Exhibit D, and **filed under seal**, is a true and correct
25 copy of Defendant BNP Paribas Securities (Asia) Limited's Supplemental Response To
26 Plaintiffs' First Set Of Interrogatories Re: Jurisdiction/Forum Non Conveniens, dated May
27 19, 2008.

1 7. Attached hereto as Exhibit E is a true and correct copy of some pages from
 2 the BNP Paribas website that describe BNP Paribas's operation. These website pages were
 3 located at my direction and can be located electronically at the following url:
 4 <http://www.banque.bnpparibas.com/en/pid496/in-brief.html?print=on>.

5 8. Attached hereto as Exhibit F is a true and correct copy of a page of
 6 information regarding BNP Paribas Securities Services, located on its website and collected
 7 at my direction. This document can be located electronically at the following url:
 8 <http://securities-services.bnpparibas.com/jahia/Jahia/site/bp2sportal/pid/69>.

9 9. Attached hereto as Exhibit G is a true and correct copy of a BNP Paribas
 10 press release dated March 13, 2007 and titled "With Geojit, BNP Paribas enters into savings
 11 products distribution in India and creates the BNP Paribas Personal Investors business line."
 12 This document was collected from the BNP Paribas website at my direction and can be
 13 located electronically at the following url: http://invest.bnpparibas.com/en/news_press-releases-print.aspx?Code=LPOI-6Z9BSP.

14 10. Attached hereto as Exhibit H is a true and correct copy of excerpts from the
 15 BNP Paribas 2006 Annual Report, collected from the BNP Paribas website at my direction.
 16 A link to a .pdf of the report can be located electronically at the following url:
 17 <http://www.bnpparibas.com/en/new/group.asp?Code=EJOA-738E4R&Key=BNP%20Paribas%20publishes%20its2-2006%annual%20report>.

18 11. Attached hereto as Exhibit I is a true and correct copy of information
 19 regarding BNP Paribas Securities, located on its website and collected at my direction. This
 20 document can be located electronically at the following url:
 21 <http://www.equities.bnpparibas.com/gb/login.asp>.

22 12. Attached hereto as Exhibit J are true and correct copies of (1) a BNP
 23 Paribas press release dated June 27, 2007 and titled "BNP Paribas Securities (Asia) Boosts
 24 Research Capabilities" and (2) company biographies of Jonathan Harris and Pierre
 25 Rousseau, linked to this release. These documents were collected from the BNP Paribas
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1 website at my direction and can be located electronically at the following url:
 2 http://hongkong.bnpparibas.com/en/new/news_print.asp?Code=CMOK-74LBAU.

3 13. Attached hereto as Exhibit K is a true and correct copy of Thomas Weisel
 4 Partners Group, Inc.'s Form 8-K filed with the Securities Exchange Commission on
 5 December 6, 2007.

6 14. Attached hereto as Exhibit L is a true and correct copy of a BNP Paribas
 7 press release dated December 6, 2007 and titled "BNP Paribas Securities Asia Launches
 8 Onshore Research Platform in India." This document was collected at my direction from the
 9 BNP Paribas website and can be located electronically at the following url:
 10 <http://www.bnpparibas.com/en/news/group.as?Code=IAKP-79MEAK&Key=BNP%20Paribas%20>.

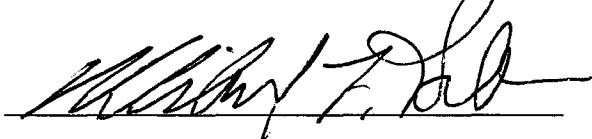
12 15. Attached hereto as Exhibit M is a true and correct copy of a "Judicial
 13 Caseload Profile Report" from the United States District Court for the Northern District of
 14 California collected from the U.S. Courts website at my direction. This document can be
 15 located electronically at the following url: <http://www.uscourts.gov/cgi-bin/cmsd2007.pl>.

16 16. Attached hereto as Exhibit N is a true and correct copy of Defendant
 17 Praveen Chakravarty's Response To Plaintiffs' First Set Of Interrogatories Regarding
 18 Jurisdiction/Forum Non Conveniens, dated May 30, 2008.

19 17. Attached hereto as Exhibit O is a true and correct copy of a July 3, 2008 e-
 20 mail from Leiv Blad to myself entitled "Discovery issue."

22 I declare under penalty of perjury under the laws of the United States of America that
 23 the foregoing is true and correct.

24 Executed this 9th day of July 2008 at San Francisco, California

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